

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

KATIE FONDREN CARSON, as Administratrix  
of the Estate of Brian Christopher Ray, ET AL.

PLAINTIFFS

VERSUS

NO. 3:23CV3063-HTW-LGI

RANKIN COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

MOTION TO EXTEND QUALIFIED IMMUNITY  
DISCOVERY AND RESPONSE DEADLINES

COME NOW the Plaintiffs, by and through counsel of record, and file their Motion to Extend Qualified Immunity Discovery and Response Deadlines. For cause, the Plaintiffs show the Court as follows:

1. The parties to this litigation have engaged in qualified immunity discovery in good faith, including drafting and serving written discovery and responding to the same, and taking numerous depositions.
2. However, the parties have encountered difficulty in conducting additional depositions and taking certain medical witness statements due to the busy trial and hearing schedules of counsel for the parties and witnesses, and difficulty getting available dates from the witnesses.
3. The parties' scheduling difficulties have, in the assessment of the parties, made the deadlines in the agreed order setting the deadlines for qualified immunity discovery and responses to the motions onerous.

4. Counsel for the parties have conferred on this matter and are in agreement that an extension of the qualified immunity discovery and motion response deadlines would benefit the parties and promote the just administration and final resolution of this civil action.

5. Consequently, after conferring with counsel for the Defendants, the Plaintiffs request the Court extend the qualified immunity motion response deadlines as follows:

Qualified Immunity Discovery	February 28, 2025
Response in Opposition to Motions	March 21, 2025
Reply in Support of Motions	March 31, 2025

6. This motion is not being filed for purposes of delay or harassment but to allow for a better presentation of the issues to the Court and to promote the interests of justice.

7. Because this motion is self-explanatory, counsel for Plaintiffs requests to be relieved from the obligation of filing a supporting memorandum.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request the Court sustain this unopposed Motion to Amend Scheduling Order and amend and extend the expert witness, discovery, and motion deadlines accordingly.

Respectfully submitted, this the 9th day of December, 2024.

/s/ Victor Israel Fleitas

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VICTOR I. FLEITAS  
MS BAR NO. 10259

Victor I. Fleitas, P.A.  
452 North Spring Street  
Tupelo, Mississippi 38804  
662.840.0270 / Telephone  
662.840.1047 / Facsimile  
[fleitasv@bellsouth.net](mailto:fleitasv@bellsouth.net) / E-mail

Charles R. "Chuck" Mullins, Esq.  
Courtney Sanders, Esq.  
Coxwell & Mullins  
500 North State Street  
Jackson, Mississippi 39201  
601.948.1600 / Telephone  
601.948.7097 / Facsimile  
[chuckm@coxwelllaw.com](mailto:chuckm@coxwelllaw.com)  
[courtneys@coxwelllaw.com](mailto:courtneys@coxwelllaw.com)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2024 I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Jason E. Dare, Esq.  
Biggs, Ingram & Solop  
Post Office Box 14028  
Jackson, Mississippi 39236  
[jdare@bislawyers.com](mailto:jdare@bislawyers.com)

Charles R. "Chuck" Mullins, Esq.  
Courtney Sanders, Esq.  
Coxwell & Mullins  
500 North State Street  
Jackson, Mississippi 39201  
[chuckm@coxwelllaw.com](mailto:chuckm@coxwelllaw.com)  
[courtneys@coxwelllaw.com](mailto:courtneys@coxwelllaw.com)

This the 9th day of December, 2024.

/s/ Victor Israel Fleitas

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VICTOR I. FLEITAS